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USDOC FOR 532/OEA/LHINES/KGAINES
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM
ZARIT

BEIJING FOR FCS JEANETTE CHU

BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A
TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION:
BEIJING RUST S&T COMPANY LTD.

REF: A) 04971

11. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

12. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) conducted a post shipment verification (PSV) at Beijing Rust S & T Company Ltd., 7/F Pahsang Industrial Building, 16 San On Street, Hong Kong (Beijing Rust). The PSV concerned GPS surveying equipment valued at \$26,286 exported to Beijing Rust by Trimble Navigation Ltd. of Dayton, Ohio in April 2006. Trimble classified the equipment under ECCN 7A994, which ECCN is controlled for anti-terrorism reasons (AT).

13. Repeated attempts by FCS staff to reach Beijing Rust as the number provided in Reftel A were unsuccessful. In fact, a representative from the telephone company's directory assistance service stated that there is no phone number listed for Beijing Rust. The management company for the Pahsang Building stated that Beijing Rust had left its building in July and had left no contact information. Finally, the ECO visited the Pahsang Building on November 15, 2006. No reference to Beijing Rust was included in the building directory and both of the two business entrances on the 7th floor of the building were locked and showed no indication that Beijing Rust was doing business at those locations.

14. A web search of the name Beijing Rust revealed that Beijing Rust has an office in Beijing and that it acts as a distributor for Trimble Navigation (www.rustsales.com.cn). Inquiry with that company in Beijing may reveal further information about the shipment (since this entity is listed as the "bill to" entity on the applicable invoice).

15. It appears to the ECO that any presence that Beijing Rust had in Hong Kong was closed in July when it left the Pahsang building. If the equipment has been classified correctly, it can most likely be exported to Hong Kong and reexported/transshipped to mainland China NLR (No License Required). The ECO can find no specific reason to assume that anything

untoward has occurred in respect of this shipment.
Therefore, in accordance with guidance on reporting of
PSVs where the items cannot be physically inspected,
the ECO recommends that this PSV be classified as
Limited.
Cunningham